

## EPA Official Record

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**Subject:** RE: Armstrong World Industries and Pope & Talbot/Port of St Helens Referrals to EPA

ATTACHMENT: EPA Referral Recommendation 6-2010 AWI.pdf

ATTACHMENT: EPA Referral Recommendation 6-2010 PSH.pdf

Sylvia, Brandon:

In January 2010, DEQ requested that EPA consider the Armstrong World Industries and Pope & Talbot/Port of St Helens facilities for possible NPL listing, which EPA subsequently performed. EPA notified DEQ in late spring that both facilities would score for listing on the NPL and requested preliminary approval from the DEQ Director to proceed with referral of the sites to EPA Headquarters for final listing decisions.

There was substantial progress moving these two sites forward by DEQ as a result of the referral request. For the Armstrong site, DEQ entered a consent order with all three current and former owners/operators requiring completion of the RI/FS for the facility within approximately 18 months. RI investigations have been moving forward on a brisk pace with fish, clams, and crayfish sampling completed and analyses in progress. A number of other activities are also in progress in wetland/upland portions of the site including soil and stormwater testing, sediment transport modeling and ecological risk evaluations. The Port of St Helens has also been successful in finding an insurance policy that is funding the supplemental RI work identified by DEQ that is essential to development and evaluation of cleanup alternatives for the site. The Port is working with DEQ pursuant to the consent order issued to them and the now defunct Pope and Talbot, and agreed to complete the RI/FS on roughly the same timeline as the Armstrong RI/FS schedule.

Attached are two memoranda approved by the DEQ Director requesting postponement of EPA's listing actions. These memoranda were structured this way due to pending uncertainty concerning finalizing the Armstrong order and Port's insurance coverage. While we are encouraged by the progress on both of these sites since the memos were issued, we remain concerned with the Port's capacity to implement a remedy to the scale necessary to address on-going releases of creosote to the bay and underlying sediment.

DEQ understands that EPA will continue to track these sites as "Other Cleanup Authority". DEQ will provide periodic updates to EPA on progress and would like to have an opportunity to present information on our Scappoose Bay sites to the Columbia River Toxics Workgroup when results of the RI field investigation are reported.

On behalf of DEQ, I would like to thank EPA for your assistance and resources devoted to evaluating these facilities for the NPL. Given the strategic importance of our collective work on the Columbia River to address source of toxics to the watershed, we will strive to move these projects to cleanup in lieu of NPL listing. If progress falters, we will seek Director/Governor approval to proceed with listing of the site(s).

Respectfully,

Bruce Gilles

<<EPA Referral Recommendation 6-2010 AWI.pdf>> <<EPA Referral Recommendation 6-2010 PSH.pdf>>

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